

EXHIBIT “A”

Bryan Sullivan

From: Michael Murphy <michael@murphlaw.net>
Sent: Tuesday, August 12, 2025 1:11 PM
To: Bryan Sullivan
Cc: rah@harpootlianlaw.com; Phillip Barber; Zachary Hansen
Subject: RE: Biden/Byrne--Local Rule 7-3 Meet and Confer Request on Plaintiff's Motion for Monetary Sanctions

Bryan:

Just so we are clear, I will not accept service of any documents that you want to serve on Mr. Byrne for the reasons stated in my previous e-mail. It will be an issue that Mr. Byrne and/or his new counsel as well as you will have to litigate in the future with the court. I am no longer involved in the case.

Very truly yours,

Michael C. Murphy, Esq.

From: Bryan Sullivan <bsullivan@earlysullivan.com>
Sent: Tuesday, August 12, 2025 12:49 PM
To: Michael Murphy <michael@murphlaw.net>
Cc: rah@harpootlianlaw.com; Phillip Barber <pdb@harpootlianlaw.com>; Zachary Hansen <zhanzen@earlysullivan.com>
Subject: RE: Biden/Byrne--Local Rule 7-3 Meet and Confer Request on Plaintiff's Motion for Monetary Sanctions

Michael,

Thank you for your email. Your belief that you are not bound by the Court's August 5, 2025 Order is your issue to raise with the Court and not with us. In that Order, the Court stated (emphasis added): "Defendant must provide Plaintiff with an email address for electronic service or a physical address for mail or overnight delivery service of documents. **Until Defendant does so, the Court will not allow Mr. Murphy to withdraw from the case.**" Nothing you filed with the Court has changed the Court's August 5, 2025 Order. We will act in compliance with the Court's August 5, 2025 Order until either Defendant complies with that Order in which case the Court stated you will be relieved as counsel per the language of that order or the Court orders us to do otherwise. We will note your response in our notice of motion.

Bryan



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theintended recipient, you may not read, copy, distribute or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Michael Murphy <michael@murphlaw.net>
Sent: Tuesday, August 12, 2025 12:09 PM
To: Bryan Sullivan <bsullivan@earlysullivan.com>
Cc: rah@harpootlianlaw.com; Phillip Barber <pdb@harpootlianlaw.com>; Zachary Hansen <zhansen@earlysullivan.com>
Subject: RE: Biden/Byrne--Local Rule 7-3 Meet and Confer Request on Plaintiff's Motion for Monetary Sanctions

Bryan:

The court approved our withdrawal from this case as counsel for Mr. Byrne effective July 29, 2025, at the hearing on that date and again on July 30, 2025, during the hearing and ruled Mr. Byrne's right to terminate us is absolute. We filed a Notice of Withdrawal and are no longer in the court's system to accept service of any documents of any kind that are filed with the court. Since we have been terminated as of July 29, 2025 as counsel for Mr. Byrne which is confirmed in the court's rulings of July 29, 2025, July 30, 2025, and the two rulings dated August 5, 2025, we no longer are legally authorized to accept service of any documents in the above-referenced case for any reason and to make any statements or serve any documents in the above case on behalf of Mr. Byrne.

We also filed and served a Notice of Compliance with the court's order of July 30, 2025, which confirms our termination as counsel for Mr. Byrne as of July 29, 2025, and that we have no authority to accept any documents on his behalf in this case or to speak on his behalf as a result of that termination. You will need to find some other method to serve Mr. Byrne with documents. We are unwilling to do it because it will put us in the position of violating the Rules of Professional conduct and California case law which mandates that once we are terminated that we must not do anything more in the case and we cannot legally accept service of any documents on behalf of Mr. Byrne. (*Calif. Rule of Prof. Conduct* 1.9; *Reynolds v. Reynolds* (1943) 21 Cal.2d 580; *Sherman v. Panno* (1954) 129 Cal.App.2d 375.)

Please govern yourselves accordingly.

Very truly yours,

Michael C. Murphy, Esq.

From: Bryan Sullivan <bsullivan@earlysullivan.com>
Sent: Tuesday, August 12, 2025 10:49 AM
To: Michael Murphy <michael@murphlaw.net>
Cc: rah@harpootlianlaw.com; Phillip Barber <pdb@harpootlianlaw.com>; Zachary Hansen <zhansen@earlysullivan.com>
Subject: RE: Biden/Byrne--Local Rule 7-3 Meet and Confer Request on Plaintiff's Motion for Monetary Sanctions

Michael,

This email is sent pursuant to Local Civil Rule 7-3 and the Court's August 5, 2025 Order regarding Plaintiff's intent to move for an order for monetary sanctions against Defendant Patrick M. Byrne ("Defendant") in the amount of \$34,969.20, which represents the costs for travel, accommodation, and meals for Plaintiff's counsel to travel from the east coast to Los Angeles, California for the July 29, 2025 trial. Substantial good cause exists for such sanctions because, as set forth in detail in the Court's August 5, 2025 Order Declining To Grant Default Judgment;

Continuing Trial; And Reopening Limited Discovery For Plaintiff (the “August 5 Order”), Defendant “is the one who caused the delay of trial” and that Defendant’s conduct “reflect[ed] a cavalier attitude at best and bad faith at worst....” Further, as this Court recognized in the August 5 Order, “Defendant’s delay of trial likely caused Plaintiff to incur significant legal costs” and the Court invited Plaintiff to make this motion for sanctions. Please let me know if Defendant intends to oppose this motion.

Bryan



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